

Rodriguez v. Delta Gen. Contracting & Mgmt. Corp.
No. 21 Civ. 01254 (BCM)

EXHIBIT 2
BILLING RECORDS & EXPENSES

**JOINT LETTER-MOTION FOR
SETTLEMENT APPROVAL**



INVOICE

TAX ID # 13-3970350

Invoice Number: 10303978
Account: PPLLC
Invoice Date: 4/13/2021
Invoice Total: \$156.00

GIANFRANCO J. CUADRA
PECHMAN LAW GROUP, PLLC
488 MADISON AVENUE, 17TH FLOOR
NEW YORK, NY 10022

Route: 70

File #: Index #: 1:21-cv-01254-AT

Your contact:

OTHER

EDGAR RODRIGUEZ, ETANO v. DELTA GENERAL CONTRACTING & MANAGEMENT, CORP., ETAL

Job #	Servee	Line item detail	Fee Prepaid	Fee	Charge	Job Total
4485215	4/6/21	DELTA GENERAL CONTRACTING & MANAGEMENT, CORP. SUMMONS, COLLECTIVE AND CLASS ACTION COMPLAINT, JURY TRIAL DEMANDED AND JUDGES RULES CHARGE - Service in Bronx			64.00	\$64.00

Total Due: \$64.00

File #: Index #: 1:21-cv-01254-AT

Your contact:

U S DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

EDGAR RODRIGUEZ, ETANO v. DELTA GENERAL CONTRACTING & MANAGEMENT, CORP., ETAL

Job #	Servee	Line item detail	Fee Prepaid	Fee	Charge	Job Total
4485223	4/6/21	SHAHID MAHMOOD SUMMONS, COLLECTIVE AND CLASS ACTION COMPLAINT, JURY TRIAL DEMANDED AND JUDGES RULES CHARGE - Service in Bronx			52.00	\$52.00
4485231	4/6/21	SAJID MAHMOOD WARRAICH SUMMONS, COLLECTIVE AND CLASS ACTION COMPLAINT, JURY TRIAL DEMANDED AND JUDGES RULES CHARGE - Service in Bronx			40.00	\$40.00

Total Due: \$92.00

PM Legal, LLC
75 Maiden Lane, 11th Floor
New York, NY 10038
(212) 233-4040
(212) 732-4327 (fax)
info@pmlegal.com

Please make checks payable to PM Legal, LLC and remit payment to the address below.

PM Legal, LLC
75 Maiden Lane, 11th Floor
New York, NY 10038

Invoice Number: 10303978
Account: : PPLLC
Invoice Date: 4/13/2021
Invoice Total: \$156.00

Amount Remitted :

Please enclose this sheet along with your payment. Thank you very much for your business.

PECHMAN LAW GROUP PLLC
A T T O R N E Y S A T L A W

488 Madison Avenue, Suite 1704
 New York, New York 10022
 Phone: (212) 583-9500
 www.pechmanlaw.com

INVOICE

Invoice # 177
 Date: 02/23/2022

Edgar Rodriguez
 6248 60th Rd, 1FL
 Maspeth, NY 11378

Delta General Contracting Corp.

Services

Attorney	Date	Notes	Quantity	Rate	Total
MA	12/11/2020	Consult with Edgar Rodriguez from Delta General Contracting.	1.10	\$125.00	\$137.50
GC	01/22/2021	Consult (GC for part of it only) with Morocho and Albert re: claims, how damages would be calculated, potential class action (and facts supporting it), documents/evidence in Morocho's possession, Morocho's concerns about a potential case and how it	0.70	\$500.00	\$350.00

<p>may affect him for future employment, hours worked and pay received by him and other employees, and Morocho's work duties performed.</p>					
GC	01/22/2021	Review and revise retainer agreements and send them to Albert.	0.30	\$500.00	\$150.00
MA	01/28/2021	Draft complaint and email it to Pechman and Cuadra for review.	2.50	\$125.00	\$312.50
GC	01/29/2021	Research corporate entity owning Delta Contracting in connection with reviewing and revising draft complaint.	0.30	\$500.00	\$150.00
GC	01/29/2021	Review and revise draft complaint.	0.60	\$500.00	\$300.00
MA	02/01/2021	Review complaint with Rodriguez.	0.70	\$125.00	\$87.50
MA	02/01/2021	Review complaint facts and retainer with Morocho.	0.40	\$125.00	\$50.00
MA	02/01/2021	Further revise complaint based on information from clients and email it to Pechman and Cuadra.	0.70	\$125.00	\$87.50
MA	02/03/2021	Prepared Consent to Sue.	0.20	\$125.00	\$25.00
GC	02/08/2021	Review, revise, and comment on complaint and consent to sue form, then send back both to Albert for review with clients.	0.60	\$500.00	\$300.00
MA	02/09/2021	TC with Ramiro Morocho to	0.30	\$125.00	\$37.50

		review facts in complaint and asked to sign consent to sue form.			
MA	02/09/2021	Prepared consent to sue form for Edgar Rodriguez.	0.30	\$125.00	\$37.50
MA	02/09/2021	TC with Edgar Rodriguez to review facts on complaint and ask him to sign consent to sue form.	0.30	\$125.00	\$37.50
MA	02/11/2021	Prepare civil coversheet, summons, and complaint to be filed on ECF.	1.00	\$125.00	\$125.00
GC	02/11/2021	Review civil cover sheet and summonses for filing (drafted by Albert).	0.20	\$500.00	\$100.00
GC	03/05/2021	Draft and send waiver of service forms and cover letters enclosing them and complaint to defendants.	0.30	\$500.00	\$150.00
GC	04/06/2021	Call with Lanza, potential defense counsel, re: being retained, potentially accepting service, and some of case facts.	0.20	\$500.00	\$100.00
GC	04/21/2021	Review and revise stipulation extending time for defendants to answer and send it back to defense counsel.	0.20	\$500.00	\$100.00
GC	05/06/2021	Initial review of Answer.	0.20	\$500.00	\$100.00
GC	05/26/2021	Email defense counsel re: need to talk about discovery before mediation, possibly	0.10	\$500.00	\$50.00

postponing mediation (because need class discovery), and Rule 26 conference.					
GC	06/02/2021	Call with defense counsel, Lanza, re: potential settlement, upcoming mediation, documents needed to be produced, how case can proceed, and initial conference.	0.10	\$500.00	\$50.00
GC	06/04/2021	Draft joint pretrial letter and proposed case management plan, then send both to defense counsel for review.	0.70	\$500.00	\$350.00
LP	06/04/2021	Discussion with Cuadra re: discovery.	0.10	\$600.00	\$60.00
GC	06/04/2021	Discussion with Pechman re: discovery needed for class settlement (or certification), recent discussion with defense counsel, and proceeding to mediation.	0.10	\$500.00	\$50.00
LP	06/04/2021	Review letter to Judge Torres re: initial conference.	0.10	\$600.00	\$60.00
GC	06/07/2021	Finalize and file and submit (via email to Chambers) proposed Case Management Plan and joint letter to court.	0.40	\$500.00	\$200.00
GC	06/07/2021	Emails with mediator re: rescheduling of mediation to last week of August or first week of September, per Court's Order (ECF No. 24).	0.10	\$500.00	\$50.00

GC	06/07/2021	Review dates and other matters in Court's Case Management Plan (including to see when mediation can take place in preparation for emailing mediator and when discovery requests should go out to defense counsel to have enough time to prepare for mediation and comply with Order).	0.10	\$500.00	\$50.00
GC	06/11/2021	Draft document requests on a class-wide basis.	1.30	\$500.00	\$650.00
GC	06/11/2021	Draft Plaintiffs' Rule 26 initial disclosures.	0.40	\$500.00	\$200.00
GC	06/11/2021	Draft interrogatories.	0.60	\$500.00	\$300.00
MA	06/11/2021	Add information obtained from clients re: individuals with discoverable information to initial disclosure doc and bate stamp documents received from clients.	0.60	\$125.00	\$75.00
MA	06/11/2021	Call with Rodriguez to discuss initial disclosures and obtain information about individuals with discoverable information.	0.30	\$125.00	\$37.50
MA	06/11/2021	Call with Morocho to discuss initial disclosures and obtain information about individuals with discoverable information.	0.20	\$125.00	\$25.00
GC	06/11/2021	Finalize and serve defense counsel with initial	0.40	\$500.00	\$200.00

disclosures, initial production, document requests, and interrogatories.					
GC	06/14/2021	Review mediation schedule, dates, and position statement requirements.	0.10	\$500.00	\$50.00
GC	06/14/2021	Review defendants' initial disclosures.	0.10	\$500.00	\$50.00
GC	07/14/2021	Email defense counsel re: class information that needs to be produced to have a productive mediation.	0.10	\$500.00	\$50.00
GC	07/27/2021	Email defense counsel re: potential settlement and outstanding discovery.	0.20	\$500.00	\$100.00
GC	07/30/2021	Email defense counsel re: status of production, will have to contact court if we do not get discovery responses and documents.	0.20	\$500.00	\$100.00
GC	08/09/2021	Email defense counsel re: need documents to calculate damages, will need to proceed to litigation on merits if we cannot do mediation (given lack of records).	0.10	\$500.00	\$50.00
GC	08/18/2021	Email defense counsel re: mediation is scheduled for early September and we still do not have the required information on a class wide basis.	0.10	\$500.00	\$50.00
GC	09/07/2021	Email defense counsel re:	0.10	\$500.00	\$50.00

status of production for potential resolution.						
GC	09/09/2021	Review initial production, complaint, and answer in preparation for mediation.	0.30	\$500.00	\$150.00	
GC	09/09/2021	Discussion with Pechman re: facts of case, lack of productions, facts denied in Answer, and potential damages in preparation for upcoming mediation.	0.20	\$500.00	\$100.00	
GC	09/09/2021	Call with Rodriguez re: mediation today, what will happen, and documents that need to be produced.	0.10	\$500.00	\$50.00	
GC	09/09/2021	Attend mediation with defense counsel, Pechman, and mediator.	1.60	\$500.00	\$800.00	
GC	09/09/2021	Email clients re: status of case, information obtained in mediation, mediation scheduled for October 22 and October 26.	0.10	\$500.00	\$50.00	
MA	09/09/2021	Call with Edgar Rodriguez to obtain information regarding google maps.	0.20	\$125.00	\$25.00	
MA	09/09/2021	Call with Javier Ramiro to obtain google maps login information, client has no location history.	0.20	\$125.00	\$25.00	
LP	09/09/2021	Prep for and attend mediation with Evan Spelfogel.	3.00	\$600.00	\$1,800.00	

LP	09/09/2021	Discuss case facts with Cuadra for upcoming mediation.	0.20	\$600.00	\$120.00
GC	09/10/2021	Email defense counsel re: discovery deadline issues, information discussed at mediation, need to send a letter requesting extension of discovery deadline (as agreed in mediation).	0.10	\$500.00	\$50.00
GC	09/10/2021	Review and revise letter to Court re: 60-day extension of deadlines in case management plan pending mediation.	0.10	\$500.00	\$50.00
GC	09/13/2021	Call with defense counsel re: need to complete all outstanding discovery by no later than October 1.	0.30	\$500.00	\$150.00
MA	09/14/2021	Call with Edgar Rodriguez to begin reviewing google maps data, specifically inquiring about work addresses in 2019 and 2020.	0.50	\$175.00	\$87.50
MA	09/15/2021	Review Edgar Rodriguez's Google Maps account history for all days in 2016 to determine how many hours, on average, he worked at Delta General, which days he worked, which days he did not work, and obtain sample workweeks to send to defense counsel.	0.90	\$175.00	\$157.50
GC	09/17/2021	Call with defense counsel re:	0.10	\$500.00	\$50.00

documents may be delayed until Monday, but he understands we will contact the Court if we do not have the records by Tuesday morning.

MA	09/17/2021	Continue to review and analyze E. Rodriguez's google maps data from 2018-2019 of all hours worked per workday based on Google Maps tracking information.	2.20	\$175.00	\$385.00
GC	09/20/2021	Email defense counsel and mediator re: need records produced or we must contact the court.	0.10	\$500.00	\$50.00
MA	09/20/2021	Call with Edgar Rodriguez to reschedule deposition preparation date.	0.10	\$175.00	\$17.50
MA	09/21/2021	Continue to review and analyze E. Rodriguez's google maps data from 2019- 2020 of all hours worked per workday based on Google Maps tracking information.	1.60	\$175.00	\$280.00
GC	09/21/2021	Draft joint letter to court re: discovery deficiencies, parties' communications to date, and plaintiffs' request for a short extension of the discovery deadline.	1.30	\$500.00	\$650.00
MA	09/21/2021	Email client with PDFs of google maps data and schedule call to review and	0.20	\$175.00	\$35.00

confirm hours worked and work addresses.					
MA	09/21/2021	Review and proofread letter to court regarding discovery deficiencies.	0.30	\$175.00	\$52.50
MA	09/21/2021	Call with Edgar Rodriguez to review PDFs of google maps data and confirm worksites and hours worked per google maps data.	1.00	\$175.00	\$175.00
MA	09/21/2021	Continue to review E. Rodriguez's google maps data, specifically looking for Sundays in which he worked based on photos received from client.	0.70	\$175.00	\$122.50
GC	09/22/2021	Review and revise joint letter to court about discovery deficiencies following receipt of edits from defense counsel.	0.20	\$500.00	\$100.00
GC	09/22/2021	Email mediator re: cannot proceed to mediation yet and informing mediator of recent filing about discovery deficiencies.	0.10	\$500.00	\$50.00
MA	09/22/2021	Prepare questions for plaintiff's upcoming deposition, regarding their hours worked, duties, and compensation.	0.60	\$175.00	\$105.00
GC	09/22/2021	Meeting with Albert and both clients to prepare for depositions, review of all documents in case, review of	2.30	\$500.00	\$1,150.00

allegations, and review of class action facts (Cuadra present for part of meeting).					
MA	09/22/2021	Meeting with Cuadra (for part of meeting), E. Rodriguez, and R. Morocho to prepare for depositions and review all documents in case.	2.70	\$175.00	\$472.50
MA	09/29/2021	Send message to E. Rodriguez and J. Morocho about depositions being cancelled until further notice.	0.10	\$175.00	\$17.50
MA	09/30/2021	Attempt to call back additional delta contracting client. Send text message to E. Rodriguez and J. Morocho to follow up with potential opt-in employee.	0.10	\$175.00	\$17.50
MA	10/04/2021	Consult with Fabio Salazar, discussed hours worked, wages, duties, requested any proof/ evidence of employment with defendants and discussed process of becoming opt-in plaintiff.	0.50	\$175.00	\$87.50
MA	10/05/2021	File Fabio Salazar's consent to sue form on ECF.	0.10	\$175.00	\$17.50
MA	10/05/2021	Resend consent to sue form to Fabio Salazar, new form includes case number and updated date.	0.10	\$175.00	\$17.50
GC	10/05/2021	Draft cover letter to defendants informing them	0.20	\$500.00	\$100.00

of their discovery obligations and that failure to comply with them can result in default judgment against them.

MA	10/05/2021	Prepare discovery requests and interrogatories for mailing.	0.20	\$175.00	\$35.00
GC	10/07/2021	Email mediator, Spelfogel, re: cannot proceed with mediation in light of potential default and no new counsel.	0.10	\$500.00	\$50.00
MA	10/07/2021	Refile Fabio Salazar's updated consent to sue form.	0.10	\$175.00	\$17.50
GC	10/18/2021	Draft and file letter to court re: permission to file default.	0.40	\$500.00	\$200.00
GC	11/12/2021	Call with Turck, new defense counsel, re: potential resolution of case, need to extend discovery deadline, and asking the court to extend the discovery deadline.	0.20	\$500.00	\$100.00
GC	11/12/2021	Review and revise joint letter-motion requesting extension of discovery deadline and send it back to defense counsel.	0.10	\$500.00	\$50.00
MA	11/15/2021	Call with Edgar Rodriguez regarding owner calling him to reach an agreement, share details with Cuadra.	0.10	\$175.00	\$17.50
MA	11/15/2021	Call with Ramiro Morocho	0.10	\$175.00	\$17.50

regarding owner calling him to reach an agreement, share details with Cuadra.					
MA	11/17/2021	Call with Fabio Salazar to discuss updates on the case.	0.10	\$175.00	\$17.50
MA	11/19/2021	Call clients to inform them of the new mediation date.	0.10	\$175.00	\$17.50
GC	12/22/2021	Email Turck, defense counsel, re: need production of documents and discovery responses ahead of mediation.	0.10	\$500.00	\$50.00
GC	01/03/2022	Email defense counsel re: production of documents needed before mediation.	0.10	\$500.00	\$50.00
GC	01/03/2022	Initial review of discovery requests received from defense counsel.	0.30	\$500.00	\$150.00
MA	01/04/2022	Begin drafting the responses to Defendant's document requests.	0.60	\$225.00	\$135.00
MA	01/07/2022	Review Rodriguez's google maps data saved on box, compare with Def's production for hours worked, compile information on excel sheet.	2.70	\$225.00	\$607.50
MA	01/10/2022	Send reminder message to client regarding settlement conference on Whatsapp.	0.10	\$225.00	\$22.50
GC	01/11/2022	Review Court's order in preparation for drafting settlement position	0.10	\$500.00	\$50.00

statement.						
GC	01/11/2022	Review damages calculations to date in preparation for drafting of settlement position statement.	0.30	\$500.00	\$150.00	
MA	01/11/2022	Begin drafting damages for Edgar Rodriguez based on clients recollection.	0.40	\$225.00	\$90.00	
MA	01/11/2022	Finished drafting E. Rodriguez's damages, with averages from Google Maps data, and draft damages for R. Morocho and F. Sanchez.	0.60	\$225.00	\$135.00	
MA	01/11/2022	Review Rodriguez's previously collected google maps data, continue searching Google Maps data for six additional workweeks between 2016- 2020, in order to draft damages.	3.10	\$225.00	\$697.50	
GC	01/12/2022	Analyze all documents defendants produced.	1.10	\$500.00	\$550.00	
GC	01/12/2022	Review defendants' document requests and interrogatories.	0.20	\$500.00	\$100.00	
GC	01/12/2022	Review of each and every discovery response and objection, including comparison of response to documents produced, in preparation for drafting of settlement position statement and call with defense counsel re: potential	0.60	\$500.00	\$300.00	

settlement and discovery deficiencies.					
GC	01/12/2022	Review documents produced and discovery requests (including responses to them) with Morocho and Albert.	0.70	\$500.00	\$350.00
GC	01/12/2022	Review of plaintiffs' production and some of document requests from defendants with Rodriguez and Albert (Cuadra present for only part of telephone conference, rest was Albert and Rodriguez only).	0.40	\$500.00	\$200.00
MA	01/12/2022	Call with Ramiro Morocho to review the defendants' production, specifically reviewing documents regarding hours worked, days worked, wages, wage notices and employment offer letters, review Def.'s interrogatories.	0.60	\$225.00	\$135.00
GC	01/12/2022	Email defense counsel re: call tomorrow at 10:30 a.m. to discuss potential settlement and discovery.	0.10	\$500.00	\$50.00
GC	01/12/2022	Draft first complete version of settlement position statement.	5.20	\$500.00	\$2,600.00
MA	01/12/2022	Call with Edgar Rodriguez to review the defendants' production, specifically reviewing documents regarding hours worked,	1.10	\$225.00	\$247.50

		days worked, wages, wage notices and employment offer letters, review Def.'s interrogatories, and his Google Maps Data.				
GC	01/12/2022	Revise and send to defense counsel damages calculations, attached to email explaining them and initial settlement demand.	0.50	\$500.00	\$250.00	
GC	01/12/2022	Finalize production of documents (pages 46 through 167) of Plaintiffs' latest production and serve them on defense counsel.	0.30	\$500.00	\$150.00	
GC	01/12/2022	Initial re-read and revision of draft settlement position statement.	0.20	\$500.00	\$100.00	
MA	01/12/2022	Call with Fabio Salazar to review the defendants' production, specifically reviewing documents regarding hours worked, days worked, wages, wage notices and employment offer letters, review Def.'s interrogatories.	0.40	\$225.00	\$90.00	
MA	01/12/2022	Begin drafting R&O's to defendants document requests, send to Cuadra for review.	3.50	\$225.00	\$787.50	
MA	01/12/2022	Draft explanatory email for damages calculations and send to Cuadra for review.	0.40	\$225.00	\$90.00	
GC	01/13/2022	Call with Turck, defense	0.80	\$500.00	\$400.00	

<p>counsel, and Albert re: all facts in dispute, evidence produced, potential discovery dispute, defendants' first settlement offer, different views on case, and potential settlement procedure at conference.</p>					
GC	01/13/2022	Review missing documents from defendants' production, as well as notes on documents produced, in preparation for call with defense counsel and Albert about potential resolution and discovery disputes.	0.30	\$500.00	\$150.00
MA	01/13/2022	Call with Turck, defense counsel, and Cuadra re: all facts in dispute, evidence produced, potential discovery dispute, defendants' first settlement offer, different views on case, and potential settlement procedure at conference.	0.80	\$225.00	\$180.00
GC	01/13/2022	Call with defense counsel re: whether mediation statements are for class or just 3 employees, confirmed just for 3 employees for settlement purposes only.	0.10	\$500.00	\$50.00
GC	01/13/2022	Review and revise settlement position statement.	1.40	\$500.00	\$700.00
LP	01/13/2022	Review and revise	0.90	\$600.00	\$540.00

settlement position statement and send notes to Cuadra.					
MA	01/13/2022	Proofread and edit position statement for mediation, send to Cuadra for review.	0.40	\$225.00	\$90.00
GC	01/13/2022	Finalize and submit settlement position statement, with all of its exhibits, to Court.	2.10	\$500.00	\$1,050.00
GC	01/13/2022	Finalize and submit plaintiffs' settlement conference acknowledgment form to Judge Moses's chambers.	0.10	\$500.00	\$50.00
GC	01/14/2022	Review and revise draft responses and objections to defendants' document requests, then send them to defense counsel.	0.80	\$500.00	\$400.00
GC	01/14/2022	Review defendants' interrogatories to plaintiffs in connection with emailing Albert about how to draft interrogatory responses and objections, how Local Rule 33.3 applies in this case (with examples of interrogatories asking for information beyond the scope of the rule), and information that should be in responses and objections.	0.30	\$500.00	\$150.00
GC	01/19/2022	Review and revise plaintiffs' responses and objections to defendants' first set of interrogatories.	1.00	\$500.00	\$500.00

GC	01/19/2022	Review settlement position statement in preparation for settlement conference tomorrow.	0.40	\$500.00	\$200.00
MA	01/20/2022	Call Salazar to confirm attendance at settlement conference. No answer, leave voicemail and send message re same on whatsapp.	0.10	\$225.00	\$22.50
GC	01/20/2022	Final review of position statement and damages calculations in preparation for settlement conference.	0.20	\$500.00	\$100.00
GC	01/20/2022	Review Plaintiffs' responses and objections to defendants' first set of interrogatories in preparation for review of the same with Rodriguez and Morocho.	0.10	\$500.00	\$50.00
GC	01/20/2022	Review all facts of case and settlement with clients.	0.40	\$500.00	\$200.00
GC	01/20/2022	Review interrogatory responses with clients.	0.20	\$500.00	\$100.00
GC	01/20/2022	Attend and participate at settlement conference, at which Judge Moses issued a settlement proposal.	3.50	\$500.00	\$1,750.00
GC	01/20/2022	Discuss proposed resolution terms, including settlement payments to each client and to attorneys, with Morocho, Rodriguez, and Albert.	0.20	\$500.00	\$100.00
MA	01/20/2022	Attend and translate for	3.50	\$225.00	\$787.50

clients during the settlement conference with Judge Moses.					
MA	01/20/2022	Review proposed settlement terms, including settlement payments to each client and to attorneys, with Morocho, Rodriguez, and Cuadra.	0.20	\$225.00	\$45.00
MA	01/21/2022	Call Salazar to discuss settlement conference, no answer leave voicemail and send whatsapp message re same.	0.10	\$225.00	\$22.50
GC	01/21/2022	Discussion with Albert re: upcoming call with Salazar about settlement conference and judge's proposal.	0.10	\$500.00	\$50.00
MA	01/21/2022	Call with Fabio Salazar re judge's recommendation for settlement conference and discussed response, Salazar accepts offer.	0.10	\$225.00	\$22.50
GC	01/21/2022	Email and call Judge Moses's chambers re: Plaintiffs accept settlement recommendation.	0.10	\$500.00	\$50.00
GC	01/21/2022	Call with Judge Moses's clerk and defense counsel re: resolution accepted by parties and case can be settled, will get order on Monday.	0.10	\$500.00	\$50.00
GC	01/25/2022	Draft and send consent to jurisdiction form to defense counsel.	0.10	\$500.00	\$50.00

MA	02/04/2022	Draft settlement agreement and send to Cuadra for review.	1.90	\$225.00	\$427.50
MA	02/04/2022	Begin drafting fairness letter.	2.60	\$225.00	\$585.00
MA	02/07/2022	Continue drafting fairness letter, send to Cuadra for review.	0.30	\$225.00	\$67.50
GC	02/07/2022	Review and revise Cheeks fairness letter and send it back to Albert for review.	2.20	\$500.00	\$1,100.00
GC	02/15/2022	Email defense counsel re: should be 7 days for default notice, with explanation of why that should be the case in the agreement.	0.10	\$500.00	\$50.00
GC	02/17/2022	Revise settlement agreement and send it back to defense counsel with explanation of revisions.	0.20	\$500.00	\$100.00
MA	02/22/2022	Send message to clients on whatsapp scheduling zoom in order to review settlement agreement.	0.10	\$225.00	\$22.50
GC	02/23/2022	Review and revise Cheeks fairness letter and send it to defense counsel for review.	0.20	\$500.00	\$100.00
MA	02/23/2022	Call Salazar to schedule time to review settlement agreement, send Moroch and Rodriguez message re same.	0.10	\$225.00	\$22.50
GC	02/23/2022	Review time records for case	0.50	\$500.00	\$250.00

in preparation for finalizing
Cheeks fairness letter.

MA	02/23/2022	Review settlement agreement with Rodriguez, Morocho, and Salazar.	0.30	\$225.00	\$67.50
MA	02/23/2022	Prepare and send settlement agreement for signature to Rodriguez, Morocho and Salazar.	0.10	\$225.00	\$22.50
MA	02/23/2022	Call with Rodriguez and Morocho to discussing completion of W9.	0.10	\$225.00	\$22.50
MA	02/23/2022	Prepare and send W9 form for completion to Rodriguez and Morocho.	0.10	\$225.00	\$22.50
GC	02/23/2022	Finalize Cheeks letter and its exhibits (including agreement) for filing with Court.	0.20	\$500.00	\$100.00

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	02/11/2021	Filing fee in Southern District of New York.	1.00	\$402.00	\$402.00
Expense	04/13/2021	Service of process on defendants using PM Legal (process server, invoice number 10303978).	1.00	\$156.00	\$156.00
					Total \$33,250.50

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
177	02/23/2022	\$33,250.50	\$0.00	\$33,250.50
Outstanding Balance				\$33,250.50
Amount in Trust				\$0.00
Total Amount Outstanding				\$33,250.50